

IU FILE EVALUATION

NARRATIVE COMMENTS

FILE _____	Industry name and address Frontier Refinery 300 Murrie Ave Cheyenne WY 82007		Total flow (gpd) 792,000	Process flow (gpd)
			Type of industry (products manufactured) gasoline, diesel, asphalt, coke	
Industry visited during PCI Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> SIC 2911	IU type: <input type="checkbox"/> Non-categorical SIU <input checked="" type="checkbox"/> CIU <input type="checkbox"/> Zero discharge with categorical process	<input type="checkbox"/> Non-significant CIU <input type="checkbox"/> Middle tier CIU <input type="checkbox"/> Other: _____	Compliance status SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
	Applicable Category: 40 CFR Part 419 subpart B			
Comments 52,000 barrel/day oil refinery. 1988 - WWTF was completed				

YES	NO	N/A	<u>IU FILE REVIEW</u>	<u>Reg. Cite</u>
			A. CA NOTIFICATION OF IU	
			1. Notification of classification or change in classification	403.8(f)(2)(iii)
			2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)
Comments 40 CFR part 419 - subpart not defined in the SDP or permit				
			B. ISSUANCE OF IU CONTROL MECHANISM	
<input checked="" type="checkbox"/>			1. Issuance or reissuance of control mechanism (permit, order or similar)	403.8(f)(1)(iii)
		<input checked="" type="checkbox"/>	2. Application for general control mechanism contents (general permit only)	
			a. Contact info	403.8(f)(1)(iii)(A)(2)
			b. Production processes	403.8(f)(1)(iii)(A)(2)
			c. Types of wastes generated	403.8(f)(1)(iii)(A)(2)
			d. Location for monitoring	403.8(f)(1)(iii)(A)(2)
			e. Any request for waiver for pollutants not present per 403.12(e)(2)	403.8(f)(1)(iii)(A)(2)

			3. General control mechanism is for CIUs where: (general permit only)	
			a. Involve same/substantially similar types of operations	403.8(f)(1)(iii)(A)(1)(i)
			b. Discharge the same type of waste	403.8(f)(1)(iii)(A)(1)(ii)
			c. Same effluent limitations	403.8(f)(1)(iii)(A)(1)(iii)
			d. Same or similar monitoring	403.8(f)(1)(iii)(A)(1)(iv)
			c. There are no CIU production-based standards, CIU mass limits, combined wastestream formula, or net/gross calculations	403.8(f)(1)(iii)(A)(2)
			4. General and individual control mechanism contents	
✓			a. Statement of duration (5 years max)	403.8(f)(1)(iii)(B)(1)
✓			b. Statement of non-transferability w/o prior notification & provision permit is transferred to new owner	403.8(f)(1)(iii)(B)(2)
			c. Applicable effluent limits (local limits, categorical standards, BMPs)	403.8(f)(1)(iii)(B)(3)
✓			d. Self-monitoring requirements	403.8(f)(1)(iii)(B)(4)
✓			• Identification of pollutants to be monitored	403.8(f)(1)(iii)(B)(4)
✓			• Sampling frequency (CIUs all parameters 2/year, SIUs per POTW determination)	403.8(f)(1)(iii)(B)(4) & 403.12(e) or (h)
✓			• Sampling locations/discharge points	403.8(f)(1)(iii)(B)(4)
✓			• Appropriate sample types (grab or composite)	403.8(f)(1)(iii)(B)(4)
✓			▪ pH, CN, phenols, O&G, sulfide, volatiles must be grab (may be lab and/or field composited per 403.12(g)(3))	403.12(g)(3) & (4)
✓			▪ others must be 24-hour flow comp. unless time is representative and authorized by POTW	
✓			• Reporting requirements (min 2/year CIUs and SIUs)	403.8(f)(1)(iii)(B)(4) & 403.12(e) or (h)
✓			• Record-keeping requirements	403.8(f)(1)(iii)(B)(4) & 403.12(o)(1) & (2)
✓			▪ All monitoring records including: sample date, place, method, time, personnel; analysis date, personnel, method; results	
✓			▪ BMP compliance documentation	
✓			e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
		✓	f. Compliance schedules (for existing sources, by date listed in category, see 403.12(b)(7))	403.8(f)(1)(iii)(B)(5), 403.12(c), & 403.12(b)(7)
✓			g. Notice of slug loading or potential problems at POTW	403.8(f)(1)(iii)(B)(4) & 403.12(f)
✓			h. Notification of spills, bypasses, upsets, etc.	403.8(f)(1)(iii)(B)(4), 403.10, 403.17 & 403.12(f)
✓			i. Notification of significant change in discharge	403.8(f)(1)(iii)(B)(4) & 403.12(j)
✓			j. 24-hour notification of effluent violation (from becoming aware)	403.8(f)(1)(iii)(B)(4) & 403.12(g)(2)

✓		k. Submit resampling results within 30-days (from becoming aware of effluent violation)	403.8(f)(1)(iii)(B)(4) & 403.12(g)(2)
✓		l. Slug discharge control plan requirement, if required by POTW	403.8(f)(1)(iii)(B)(6)
✓		m. Certification statements (CIUs require general cert for BMR, 90-day compliance report, & periodic compliance reports; some CIUs require TTO cert)	403.12(g)(1) & categories subject to TTOs
✓		n. Sampling/analysis requirements (Part 136 or alternative)	403.12(g)(5)
✓		o. Reporting of additional sampling	403.12(g)(6)
	✓	p. 90-day compliance report (CIUs only; existing sources 90 days after compliance date; new sources 90 days after starting discharger; see sampling requirements in 403.12(g)(4))	403.8(f)(1)(iii)(B)(4) & 403.12(d)
	✓	q. Toxic organic management plan implementation (if CIU has TTO certification in lieu of monitoring for TTOs)	433.12(b) for metal finishing or see category for other CIUs with TTOs
✓		r. Implementation of category specific requirements (example: metal finishing – CN monitoring is after CN treatment, before dilution with other wastestreams)	403.8(f)(1)(iii)(B)(4), 403.12(c) for metal finishing CN or see category for other CIUs with TTOs

Comments

C. CA APPLICATION OF IU PRETREATMENT STANDARDS			
✓		1. IU categorization CIU Non-categorical SIU Non-significant CIU Middle tier CIU Zero discharge with categorical process Other	403.8(f)(1)(ii) 403.3(v)(1)(i) 403.3(v)(1)(ii) 403.3(v)(2) 403.12(e)(3) 403.3(v)(3)
		2. Calculation and application of categorical standards a. Classification by category/subcategory b. Classification as new/existing source c. Application of limits for all regulated pollutants	403.8(f)(1)(ii)
✓		3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
✓	✓	4. Calculation and application of production-based standards	403.6(c)

		<input checked="" type="checkbox"/>	5. Calculation and application of combined wastestream formula (CWF) or flow weighted average (FWA)	403.6(d)&(e)
		<input checked="" type="checkbox"/>	6. Application of most stringent limit	403.8(f)(1)(ii)

Comments

D. CA COMPLIANCE MONITORING			
<i>Sampling</i>			
<input checked="" type="checkbox"/>		1. Sampling (independent of fU) once per year – CIU, non-categorical SIU once per 2 years – Middle tier CIU once per permit term – sampling for pollutants not present waiver	403.8(f)(2)(v) 403.12(e)(2) 403.12(e)(3)
<input checked="" type="checkbox"/>		2. Sampling at frequency specified in approved program	
<input checked="" type="checkbox"/>		3. Documentation of sampling activities	403.8(f)(2)(vii)
<input checked="" type="checkbox"/>		4. Analysis of results for all parameters	403.8(f)(2)(v)
<input checked="" type="checkbox"/>		5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii) 403.12(g)(5)
<i>Inspection</i>			
<input checked="" type="checkbox"/>		6. Inspection (once a year) once per year – CIU, non-categorical SIU once per 2 years – Middle tier CIU	403.8(f)(2)(v) 403.8(f)(2)(v)(C)
<input checked="" type="checkbox"/>		7. Inspection at frequency specified in approved program	
<input checked="" type="checkbox"/>		8. Documentation of inspection activities	403.8(f)(2)(vii)
<input checked="" type="checkbox"/>		9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
<i>Other Evaluations</i>			
		10. Evaluate once per year whether NSCIU still meets NSCIU criteria	403.8(f)(2)(v)(B) 403.3(v)(2)
<input checked="" type="checkbox"/>		11. Receive and analyze periodic compliance reports and other reports and notices	403.8(f)(2)(iv)
<i>Recordkeeping</i>			
<input checked="" type="checkbox"/>		12. Keep records for 3 years <ul style="list-style-type: none"> ▪ Period compliance reports and other reports/notices ▪ All monitoring records including: sample date, place, method, time, personnel; analysis date, personnel, method; results ▪ BMP compliance documentation ▪ Other monitoring records 	403.12(o)
Comments			

E. CA ENFORCEMENT ACTIVITIES		
		1. Identification of violations
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	a. Discharge violations
	<input checked="" type="checkbox"/>	b. Monitoring/reporting violations - <i>temp not being monitored</i>
	<input checked="" type="checkbox"/>	c. Compliance schedule violations
		2. Calculation/evaluation of SNC
<input checked="" type="checkbox"/>		<ul style="list-style-type: none"> ▪ Chronic and Technical Review Criteria (numeric effluent violations) ▪ Interference/pass-through (including endangering health of POTW personnel or general public) ▪ Imminent endangerment to human health, welfare or to the environment or resulted in POTW's exercise of emergency authority ▪ Failure to meet compliance schedule milestone within 90 days ▪ Report 45 days late (only for BMR, 90-day, periodic, reports on compliance with compliance schedules) ▪ Failure to accurately report noncompliance ▪ Other, as determined by POTW
	<input checked="" type="checkbox"/>	3. Adherence to approved ERP
		<ul style="list-style-type: none"> ▪ Correct personnel implement activity, within time period specified ▪ ERP addresses all anticipated types of noncompliance
	<input checked="" type="checkbox"/>	4. Escalation of enforcement
	<input checked="" type="checkbox"/>	5. Publication for SNC

Comments

F. IU COMPLIANCE STATUS		
<i>Self-Monitoring and Reporting</i>		
<input checked="" type="checkbox"/>		1. Sampling at frequency specified in control mechanism/regulation
	<input checked="" type="checkbox"/>	2. Analysis of all required pollutants - <i>Temp</i>
<input checked="" type="checkbox"/>		3. Sampling/analysis using Part 136 requirements, if procedure exists
	<input checked="" type="checkbox"/>	4. Submission of complete BMR (new CIUs) (90 days prior to discharge for new sources, 180 days after category effective day for existing sources)
	<input checked="" type="checkbox"/>	5. Submission of complete 90-day compliance report with required sampling in 403.12(g)(3)&(4) (90 days from beginning discharge for new sources, 90 days from date of final compliance for existing sources)
<input checked="" type="checkbox"/>		6. Periodic self-monitoring reports

Sludge plan submitted 8/30/13 - the date it was due

		7. Reporting all required items:	403.12(e), (g)(1)&(h)
		<ul style="list-style-type: none"> ▪ Pollutants ▪ Other data required by the control mechanism ▪ BMP documentation, if applicable ▪ CIUs - Measured or estimated avg. daily and max flows, unless more detail required by POTW ▪ CIUs with equivalent mass or concentration limits – reasonable measure of long term production rate ▪ CIUs subject to production-based category - actual average production rate for the reporting period 	
✓		8. More frequent monitoring including in report	403.12(g)(6)
✓		9. Signatory/certification of reports (CIU reports: BMR, 90-day, periodic)	403.12(l)
✓		10. Submission of compliance schedule reports by required dates	403.12(c)
	✓	11. Notification within 24 hours of becoming aware of <ul style="list-style-type: none"> ▪ Discharge violation - <i>failure to sample pH in 6/2012 wasn't reported w/in 24 hours</i> ▪ Slug load ▪ Accidental spill ▪ Unanticipated bypass (w/ 5-day follow-up report) ▪ Upset (w/ 5-day follow-up report) 	403.12(g)(2) 403.8(f)(2)(vi)(C) 403.12(l) 403.12(f) 403.17 403.16
✓		12. Resampling /reporting within 30 days of knowledge of violation	403.12(g)(2)
✓		13. Notification of hazardous waste discharge	403.12(j)&(p)
✓		14. Development/implementation of slug discharge control plan, if required by POTW	403.8(f)(2)(vi)
	✓	15. Notification of significant changes	403.12(j)
Discharge			
✓		13. Noncompliance with discharge limits (but not SNC)	
		14. SNC <ul style="list-style-type: none"> a. Chronic violations b. Technical Review Criteria (TRC) c. Pass through or interference (including endangering health of POTW personnel or general public) <ul style="list-style-type: none"> ▪ Spill or slug load d. Imminent endangerment to human health, welfare or to the environment or resulted in POTW's exercise of emergency authority 	403.8(f)(2)(viii) 403.8(f)(2)(viii)(A) 403.8(f)(2)(viii)(B) 403.5(a)(1) 403.8(f)(2)(viii)(C) 403.8(f)(2)(viii)(D)
	✓	e. Other discharge violations (specify)	403.8(f)(2)(viii)(H)
Reporting/Other Noncompliance			

✓			15. Noncompliance with reporting requirements (but not SNC) 16. SNC with reporting other requirements <ul style="list-style-type: none"> ▪ Failure to meet compliance schedule milestone within 90 days ▪ Report 45 days late (BMR, 90-day, periodic, other compliance reports, etc.) ▪ Failure to accurately report noncompliance Other, as determined by POTW	403.8(f)(2)(viii) 403.8(f)(2)(viii)(E), (F),&(G)
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Comments

outfall 001 and effluent limits and monitoring requirements do not match → if you want monitoring only add that to the limits section to prevent confusion.

Temperature is not being monitored or reported. by Frontier or BOPU

pH wasnt monitored on 6/6/12 and the violation wasnt reported until the SME was submitted on 7/30/12.

Record keeping includes documentation of compliance with 40CFR part 136.7C. What is part 136.7C?

Flow monitoring is adequate but max and average daily flow need to be reported and that should be clear in the permit.

\$5,000/day fine isnt approved but its in the permit

SECTION I COMPLETED BY:	DATE:
TITLE:	TELEPHONE:

Temperature not being reported.

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FILE REVIEW WORKSHEET

L FILE REVIEW WORKSHEET

RU name Frontier Refinery

INSTRUCTIONS: For each pollutant required to be regulated record the local limit and categorical standard (if applicable) that the CA should be applying and enforcing. Then record that actual discharge limits applied through the control mechanism (permit). Also record the sample type and frequency required by the control mechanism.

Permit issuance date May 31 2013 Permit expiration date July 31 2017

Parameter	Local Limit	Categorical Standards		Permit Discharge Limits		Required Sample Type	Required Sample Frequency
		Daily Average	Long-Term Average	Daily Average	Long-Term Average		
As	0.423			0.423		24 hr composite	2/month
Cd	0.013			0.013			
Cr	3.129			5.129			
Cu	0.19			0.190			
Pb	0.18			0.180			
Hg	0.012			0.012			
PPH	0.638			0.638			
Ni	0.336			0.336			
Se	0.583 ppm			0.522 PPM			
Zn	1.339			0.339		✓	✓
TPH	50			50		Doesnt say for oilfall off	001
Benzene	50 µg/l			50 µg/l		Grab	2/month
BTEX	750 µg/l			750 µg/l		Grab	
Ammonia	600	100		600		24 hr comp	
Comments						Grab says doesn't monitoring require	2/month
Oil/grease	100	100		60			
temp				40°C		down't say	
pH	5-11			5-11		grab	1 day
Alk	0.161			0.161		24hr comp	2/day

PERMIT LIMITS WORKSHEET

COMPLETED BY:

TITLE:

DATE:

TELEPHONE:

monitoring requirements for oilfall off, don't match effluent limits.

FILE REVIEW WORKSHEET (Continued)

II. IU SELF-MONITORING WORKSHEET

IU name

INSTRUCTIONS: Review IU self-monitoring reports and data and record the information in the appropriate columns below.

IU Self-Monitoring

Date Sample Collected	Date Report Received	Date Report Due	Days Late	Pollutants Monitored	Sample Type	Pollutants Missing
6/6/12	7/30/12	7/30/12	0	all required	comp and grab	none
6/13/12	7/30/12					/
6/19/12	7/30/12					
3/6/13	4/29/2013	4/30/13	0	all	com grab	none
3/13/13						
3/20/13						

Yes No

Do reports indicate 40 CFR Part 136 analytical methods were used?

Were self-monitoring reports signed/ certified?

List any reports not signed/certified.

If subject to TTO certification, were they submitted as required?

N/A

--	--

6/6/12 ~~Se C.079~~ 0.190 mg/L \times 0.139 gallons \times 8.34 = 0.220

6/7/12 did not sample pH - didn't notify w/in 24 hours but sampling continued daily on 6/8/12

FILE REVIEW WORKSHEET (Continued)

III. POTW MONITORING REPORTS WORKSHEET

IU name

INSTRUCTIONS: Review POTW monitoring records and enter the information in column 1 and 2. For the other columns either 1) note the actual data in the appropriate columns, or 2) indicate with a yes (Y) or no (N) whether the information was found in the POTW's monitoring records. Indicate if sample type was inappropriate, if chain-of-custody was incomplete, or if analytical methods other than Part 136 methods were used.

Comments:

$$Se = 5.154 \text{ mg/l} \times 0.463 \text{ mgD} \times 3.34 = 0.216 \text{ lbs/d}$$

FILE REVIEW WORKSHEET (Continued)

IV. VIOLATIONS BASED ON IU SELF-MONITORING AND POTW MONITORING DATA WORKSHEET

IU name

INSTRUCTIONS: Review IU self-monitoring and POTW monitoring data; compare this information to the permit limits; and list all violations.

Date of Violation	Pollutant	Type (Daily or Long-Term Average)	Monitoring Result	POTW Monitoring or IU Self-Monitoring	Date IU Notified CA	Date Re-sampling Results Submitted	Days of Violation
4/7/12	pH	didn't sample		IU	7/30/12	7/30/12	1
3/13/13	Se	Daily	0.938	IU	3/15/13	3/20/13	5

Comments:

FILE REVIEW WORKSHEET (Continued)

V. ENFORCEMENT ACTIONS AGAINST IU WORKSHEET

IU name

INSTRUCTIONS: Record violations, (e.g. 3/15/91, zinc), the enforcement actions taken by the CA (e.g. telephone, 4/1/91) and the response of the IU (e.g. re-sampled, 4/15/91 - returned to compliance).

Date of Violation	Nature of Violation	Action Taken	Action Date	IU Response	Response Date
3/13/13	Se effluent limit	NOV + penalty	6/20/13	paid fine	7/8/13

Spills, slugs, and accidental discharges	N/A	Date of spill/slug	Time CA notified
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Description of spill/slug

CA response

Comments:

FILE REVIEW WORKSHEET (Continued)

FILE REVIEW WORKSHEET (Continued)

VII. CIUs WORKSHEET

IU name

INSTRUCTIONS: Record information from IU file, note any apparent misapplication of the applicable categorical pretreatment standards.

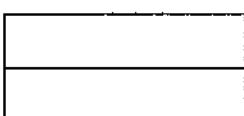
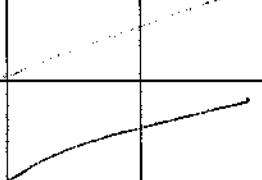
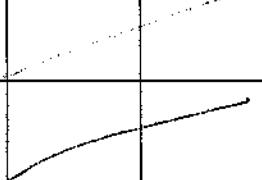
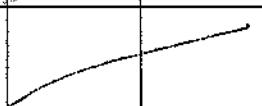
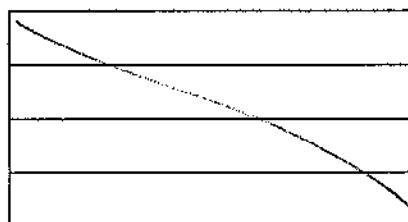
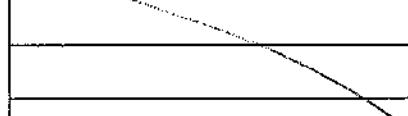
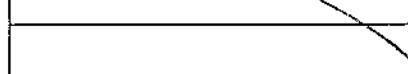
1. IU category (s)

Petroleum Refining

2. List all applicable subcategories.

B - Cracking Subcategory

3. New or existing source. Provide justification for an existing source.

	Yes	No
4.a. Does the sampling location contain nonregulated or dilution wastestreams? Stormwater (dilution as a substitute for treatment is prohibited – 403.6(d))	<input checked="" type="checkbox"/>	
· CA		
· IU		
b. If yes, is the combined wastestream (CWF) applied? (403.6(e)) (process effluent must mix before treatment, limit cannot be below detection limit)	<input checked="" type="checkbox"/>	
Such a negligible amount daily limits same or less than categorical		
c. If yes, is flow weighted average (FWA) applied?	<input checked="" type="checkbox"/>	
5. Is the facility subject to production-based standards? (403.6(c))	<input checked="" type="checkbox"/>	
a. If yes, provide the following information.		
· Average production		
· Average process flow		
b. If yes and the control mechanism contains concentration limits, was the calculation correct? (403.6(c)(2),(3),&94) and guidance document)		
6. If permit limits are expressed in terms of concentration in the categorical standard but converted to mass in the control mechanism, does the IU meet the requirements of 403.6(c)(5)?		
7. Provide the following information on TTO monitoring and reporting (if applicable).		
a. Date initial scan performed		
b. Date organic management plan submitted		
c. Date(s) certifications submitted (in the past 12 months)		
d. Date(s) monitoring performed (in the past 12 months)		

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PUBLIC NOTICE OF ENVIRONMENTAL NONCOMPLIANCE: During 2010, Walmart Distribution Center was in significant noncompliance with their Industrial Wastewater Discharge Permit (BOPU IWP #2007 Walmart-1), issued by the City of Cheyenne Board of Public Utilities. The Permit specifies numerical concentration limits which regulate the discharge of 5 day biochemical oxygen demand, total suspended solids, heavy metals, volatile organic compounds, total petroleum hydrocarbons, pH and fats, oils and grease into the sanitary sewer. The Permit requires Walmart Distribution Center to report results of wastewater samples collected at the facility to the Board of Public Utilities. Walmart Distribution Center was in significant noncompliance during the 2nd and 3rd quarters of 2010 for technical review criteria effluent violations for copper and zinc. Notices of Violation have been issued and penalties collected from Walmart Distribution Center. March 3, 5, 2011

Mar 03, 2011 Save ad

PUBLIC NOTICE OF ENVIRONMENTAL NONCOMPLIANCE: During 2010, Frontier Refining Inc. was in significant noncompliance with their Industrial Wastewater Discharge Permit (BOPU IWP #2008 Frontier-2), issued by the City of Cheyenne Board of Public Utilities. The Permit specifies numerical concentration limits which regulate the discharge of heavy metals, volatile organic compounds, total petroleum hydrocarbons, pH and oil and grease into the sanitary sewer. The Permit requires Frontier Refining, Inc. to report results of wastewater samples collected at the facility to the Board of Public Utilities. Frontier Refining, Inc. was in significant noncompliance during the 2nd, 3rd and 4th quarters of 2010 for technical review criteria effluent violations for oil and grease and benzene. The facility was in significant noncompliance during the 4th quarter of 2010 for chronic effluent violations for benzene. Notices of Violation have been issued and penalties collected from Frontier Refining, Inc. Temporary measures are in place to reduce infiltration into the sanitary sewer system. Permanent solutions are scheduled to be implemented. March 3, 5, 2011

Mar 03, 2011 Save ad

2012 VIOLATION TRACKING (continued)

2041 VIOLATION TRACKING

2013 PCT Notes - Stephanie Greek
(Debtors)

FINANCES

PNC Procedure

- * Send EPP - additional guidance
- * More detail on SW procedure - Rec.
- * Add debtors category into
- * Evaluate quality - recommendations

Reserves current position returning

Additional funds required for 3 time period
to settle debts for a full year plus an extra 3 days
but does not say if

* Return to existing user to
verify processes have had chance to

Ordinance

- * Is the new one approved?
- * Recent implementation yet, been
\$1500/day max in frontier
- + AFB

* Allocation of libid/day - need to
check last financials w/ new AF

PN permit

- * Sust plans
- * Evaluate on a regular basis
- * Feed Sheet, why do or do they
not need one?

Permits / Finance rec. due of supplies

- * Transferability - some prohibit some
or allow w/ permission - ordinance
says it can be done w/ permit
- * AFB reg. is transferred - must
be. copy of permit given to
new owner

Reporting req

- * Vague - rel. nature & characteristics
- example respond - not
will threat subs to
regarding by the prov.
limits

- * Not best - allow includes
domestic & not allocated for
AFB - includes domestic
- * Proves - includes subs in
category
- * AFB - * allocated AFB see
as great to AFB

- * AFB - ordinance doesn't make
sense, and not covered
in AFB, w/ funding
Walt-Mart

- * Flow reporting for City not
per 403
- * Limit X not clear if says or intent.

transferred

to all mixed
Air B WTP testing, After
inf P-Plan, provided comment

* Environment
* WEF - must - not meeting time
* framing in E&P
* issuing Non-objection notice or
or other
or
* AFB - BOD violator - E&P
required plane cell / new

* WEF
* SNC Due 11/14/2013
* regrading 1/20/14 within 30 days
due to AFB

* At until point do Nov
* or get rejected
* J. send EPA penalty plan

CFE written

- \$14 ?
- Full / partial?
- Regulating downstream?
- Should look at it for
- the electric - on wastewater
- what for small are they finding?

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